

Hon. Robert J. Bryan

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

LAWRENCE HARTFORD; DOUGLAS
MITCHELL; BRETT BASS; SPORTING
SYSTEMS VANCOUVER, INC.; SECOND
AMENDMENT FOUNDATION; AND
FIREARMS POLICY COALITION, INC.,

Plaintiffs,

v.

BOB FERGUSON, in his official capacity as
Washington State Attorney General; JOHN R.
BATISTE, in his official capacity as Chief of the
Washington State Patrol; JOHN GESE, in his
official capacity as Sheriff for Kitsap County,
Washington; CLAYTON MYERS, in his official
capacity as Sheriff for Kittitas County,
Washington; JOHN HORCH, in his official
capacity as Sheriff for Clark County,
Washington; ADAM FORTNOY, in his official
capacity as Sheriff for Snohomish County,
Washington; CHAD M. ENRIGHT, in his
official capacity as County Prosecutor for Kitsap
County, Washington; GREG ZEMPEL, in his
official capacity as County Prosecutor for
Kittitas County, Washington; TONY GOLIK,
in his official capacity as County Prosecutor for
Clark County, Washington; and JASON
CUMMINGS, in his official capacity as County
Prosecutor for Snohomish County, Washington,

Defendants.

No. 3:23-cv-05364-RJB

DECLARATION OF
BRETT BASS
IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION

1 I, Brett Bass, declare as follows:

2 1. I make this declaration in support of my Motion for Preliminary Injunction. I am
3 over the age of 18, have personal knowledge of the matters stated herein and, if called upon, I could
4 and would competently testify thereto.

5 2. I am a member of both member of Second Amendment Foundation and Firearms
6 Policy Coalition, Inc.

7 3. I want to acquire a Palmetto State Armory AK-103.

8 4. If it were legal in the state of Washington to acquire a Palmetto State Armory AK-
9 103 I would do so.

10 5. But for the recently enacted ban on transfer of any Palmetto State Armory AK-103,
11 I would acquire one.

12 6. However, because I fear prosecution by Defendants if I did acquire a Palmetto State
13 Armory AK-103, I cannot do so while the ban remains in force.

14 7. I am also unaware of any licensed, law-abiding dealer who would sell me a Palmetto
15 State Armory AK-103, because such sales have been made illegal and a civil violation of the
16 Washington Consumer Protection Act.

17 8. I am prepared to testify to the foregoing at trial of this matter.

18 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury of the laws of the United States
19 that the foregoing is true and correct.

20 Signed this _____ day of May, 2023, at _____.

21 
22 _____

23 Brett Bass
24
25
26
27